# BEFORE THE FEDERAL COMMUNICATIONS COMMISSION WASHINGTON, D.C. 20554

In the Matter of	)
)	
Amendment of Part 90 of the Commission Rules	) WP Docket No. 07-100

## COMMENTS OF THE Grundy County Emergency Telephone System Board

#### I. INTRODUCTION

The Grundy County Emergency Telephone System Board provides these comments regarding the above captioned matters addressed in the Notice of Proposed Rulemaking, FCC 07-85, adopted by the Commission on May 9, 2007.

#### II. DISCUSSION

Paragraph #4 comments: The fire service in Illinois has a long history of using paging on the voice channels. This is done for alerting primary responding units, alerting auto and mutual aid units, alerting on duty personnel to return from various duty related non-emergent assignments, alerting off duty personnel to respond, and making announcements of interest to surrounding departments or personnel. Eliminating or restricting the use of paging on the voice channels would be detrimental to the fire service in Illinois. The FCC acknowledges that "paging and voice operations can generally co-exist on the same channel in the same area, provided the paging transmissions are infrequent (low traffic volume) and the paging licensee monitors the channel prior to transmitting."

Paragraph #5 comments: Paging on mutual aid frequencies in Illinois is critically important. The Illinois Fire Service has a state-wide fire mutual aid system that uses a common frequency (154.265 MHz) which uses radio frequency paging for notification of alarm activation and units due to respond. The system called the Mutual Aid Box Alarm System (MABAS) is recognized as a model for fire service mutual aid and is being copied by other states to facilitate the sharing of resources for fire and rescue emergencies. The elimination or restriction of paging on the mutual aid frequencies would severely impact this operation across the state.

The other frequency that is mentioned by the FCC is the MERCI channel (155.340 MHz). Paging on this frequency is primarily done by hospitals.

**Paragraph 6 comments:** The fire service in Illinois has a long history of using paging on the voice channels. This is done for alerting primary responding units,

alerting auto and mutual aid units, alerting on duty personnel to return from various duty related non-emergent assignments, alerting off duty personnel to respond, and making announcements of interest to surrounding departments or personnel. Eliminating or restricting the use of paging on the voice channels would be detrimental to the fire service in Illinois. In a majority of cases the paging is used by a large portion of the volunteer departments that would find it financially impossible to implement other more costly commercial based systems that are less effective for alerting their members. The increased cost of commercial systems would also impact the smaller full time departments that use RF paging.

Paging on mutual aid frequencies in Illinois is critically important and should be maintained as an option on the voice channels. The Illinois Fire Service has a state-wide fire mutual aid system that uses a common frequency (154.265 MHz) which uses radio frequency paging for notification of alarm activation and units due to respond. The system called the Mutual Aid Box Alarm System (MABAS) is recognized as a model for fire service mutual aid and is being copied by other states to facilitate the sharing of resources for fire and rescue emergencies. The elimination or restriction of paging on the mutual aid frequencies would severely impact this operation across the state of Illinois and other surrounding states.

### III. CONCLUSION

Paging is a critically important operation for our first responders, without green spectrum in VHF or UHF for public safety to transition to for this purpose would greatly impact operations. Paging is our primary method of alerting local area fire and ems departments that also meets industry stands for emergency response notification.

Respectfully Submitted,

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